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5 Attorney for Defendant
MARK BRUNO

6 UNITED STATES DISTRICT COURT
7
8 NORTHERN DISTRICT OF CALIFORNIA

9 -000-

10 UNITED STATES OF AMERICA,

CR. No. 11-00291-SBA

11 Plaintiff,

12 vs.

**STIPULATION AND ~~PROPOSED~~
ORDER TO RELEASE DEFENDANT
MARK BRUNO FORTHWITH
FROM CUSTODY**

13
14 MARK BRUNO, et al.,

15 Defendant

16 _____ /
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19 IT IS HEREBY STIPULATED AND AGREED by and between Randy Sue

20 Pollock, counsel for defendant Mark Bruno and Assistant United States Attorney James

21 Mann that MARK BRUNO be released from custody at the Santa Rita Jail Infirmary

22 FORTHWITH. This change in the conditions of his release is based on his deteriorating

23 medical condition following his recent eight day stay at Valley Medical Hospital where he

24 was treated for gangrene. The parties believe that defendant's deteriorating medical

25 condition and need for immediate, acute medical care to avoid potential further

26 amputation above his knee constitute "exceptional reasons" justifying release pursuant to

27 18 U.S.C. Section 3145©.
28

1 Counsel agree that Mr. Bruno's brother Richard Bruno shall be designated as his
2 custodian to pick Mr. Bruno up from Santa Rita and transfer him to Valley Medical
3 Hospital. He shall also be responsible for any subsequent move to a skilled nursing or
4 rehabilitation facility.

5 Defense counsel will deposit all of Mr. Bruno's liquid financial assets into an
6 attorney trust account as was created when he was previously on bond.

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8 Date: April 16, 2012

/s/
RANDY SUE POLLOCK
Counsel for Defendant
Mark Bruno

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10
11 Date: April 16, 2012

/s/
JAMES MANN
Assistant United States Attorney

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15 SO ORDERED:

16 April 16, 2012


SANDRA B. ARMSTRONG